

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

Nathan Connolly and Shani Mott,

Plaintiffs,

v.

Shane Lanham, 20/20 Valuations, LLC, and
loanDepot.com, LLC,

Defendants.

Civil Action No. 1:22-cv-2048-SAG

INITIAL JOINT STATUS REPORT

Plaintiffs and Defendants (jointly, the “Parties”) jointly submit this Initial Joint Status Report pursuant to this Court’s Scheduling Order of October 2, 2023 (the “Scheduling Order”).

I. MODIFICATION OF SCHEDULING DEADLINES

The Parties seek to modify the deadlines set in the Court’s Scheduling Order, as set forth below. The Parties believe that the proposed schedule adjustments will allow them sufficient time to conduct necessary discovery without unreasonably delaying the progress of the litigation.

The Parties request that Scheduling Order be modified to reflect the following amended deadlines:

The Parties’ Proposed Schedule:

- a. Deadline for Plaintiffs’ expert reports – March 22, 2024
- b. Deadline to supplement discovery – April 19, 2024
- c. Close of fact discovery – May 17, 2024
- d. Deadline for Defendants’ expert reports – May 17, 2024
- e. Deadline for Plaintiffs’ rebuttal expert reports – June 14, 2024
- f. Close of expert discovery – July 3, 2024

- g. Status Report due – July 3, 2024
- h. Responses to Requests for admission due – July 17, 2024
- i. Dispositive pretrial motions deadline – September 6, 2024

II. SETTLEMENT/ADR CONFERENCE

The parties do not request an early settlement/ADR conference at this time.

III. DEPOSITION HOURS

The Parties propose that, for depositions of fact witnesses, Plaintiffs be limited to 10 depositions and no more than 70 deposition hours, Defendant loanDepot be limited to 7 depositions and no more than 49 deposition hours; and Defendants Lanham and 20/20 Valuations, collectively, be limited to 7 depositions and no more than 49 deposition hours. The Parties agree that either side may seek additional depositions by agreement between the Parties or by order of the Court upon showing of good cause.

IV. MODIFICATIONS TO DISCOVERY PROVISIONS

For written discovery, the Parties request that the number of Requests for Production be increased to 40 and the number of Requests for Admission be increased to 40, excluding Requests for Admission used to authenticate documents for trial.

V. MAGISTRATE JUDGE

The parties do not unanimously consent to proceed before a United States Magistrate Judge.

Dated: October 16, 2023

Respectfully Submitted,

/s/ John Relman

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of October 2023, a copy of the foregoing Initial Joint Status Report was filed using the CM/ECF system for the District Court of Maryland.

/s/ John Relman